

# EXHIBIT A

Highly Confidential - Mona Hanna-Attisha, M.D.

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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)  
) Civil Action No.  
) 5:16-cv-10444-JEL-MKM  
In re: FLINT WATER CASES ) (consolidated)  
)  
) Hon. Judith E. Levy  
) Mag. Mona K. Majzoub  

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)

HIGHLY CONFIDENTIAL  
Tuesday, August 25, 2020  
VOLUME I

Remote videotaped deposition of  
MONA HANNA-ATTISHA, M.D., conducted at the location of  
the witness in Flint, Michigan, commencing at  
9:22 a.m., on the above date, before Carol A. Kirk,  
Registered Merit Reporter, Certified Shorthand  
Reporter, and Notary Public.

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1 will capture the highest 2.5 percent of tested  
2 children; is that right?

3 A. Yeah. It's really important to  
4 note of tested children. Many children are not  
5 tested. The testing rates are very low,  
6 especially when the CDC moved away from  
7 universal testing to testing based on risk  
8 factors.

9 Q. Okay. If we continue with this --  
10 well, strike that. Let me ask a different  
11 question.

12 Thinking back to the chart, the  
13 graph, that we looked at about decreasing blood  
14 lead levels or the decrease in the percentage of  
15 children having elevated levels, in, as I  
16 recall, the -- in the late '70s and early '90s  
17 is when we had that level approaching  
18 90 percent, 90 percent of kids with levels  
19 greater than 10 percent, right?

20 A. Uh-huh, yes.

21 Q. Was that entire population in the  
22 1970s and 1980s lead poisoned?

23 A. Yes. Everybody who was exposed to  
24 lead was poisoned with lead.

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1 Q. Was that entire population  
2 irretrievably brain damaged?

3 A. I have not done research on an  
4 entire population.

5 MR. STERN: Object to form.

6 Q. Certainly in the 1970s and 1980s,  
7 we had a generation that became doctors,  
8 chemists, astronauts, engineers, presidents,  
9 accountants, maybe even some lawyers, even with  
10 90 percent having what you're describing as  
11 poisonous lead levels, true?

12 MR. STERN: Object to form,  
13 argumentative.

14 Q. You can answer, Doctor.

15 A. I respect the science. I respect  
16 the science of what we know about lead exposure,  
17 that we know that even very low levels can cause  
18 significant life-altering consequences. And my  
19 only response is that imagine if we didn't have  
20 that lead exposure, what those children that  
21 were highly exposed could have become.

22 Q. Okay. I guess is that -- you said  
23 some children even at lower levels may exhibit  
24 effects from lead exposure, but it's really on

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1 DEPOSITION ERRATA SHEET

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4 Case Caption: Flint Water Cases

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6 DECLARATION UNDER PENALTY OF PERJURY

7

8 I declare under penalty of perjury that I  
9 have read the entire transcript of my deposition taken  
10 in the captioned matter or the same has been read to  
11 me, and the same is true and accurate, save and except  
12 for changes and/or corrections, if any, as indicated  
13 by me on the DEPOSITION ERRATA SHEET hereof, with the  
14 understanding that I offer these changes as if still  
15 under oath.

16

17

\_\_\_\_\_  
MONA HANNA-ATTISHA, M.D.

18

19 SUBSCRIBED AND SWORN TO

20 before me this \_\_\_\_\_ day

21 of \_\_\_\_\_, A.D. 20\_\_\_\_

22

23

\_\_\_\_\_  
Notary Public

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